

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**IKON OFFICE SOLUTIONS, INC.\***

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**PLAINTIFF,**

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**VS.**

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**CIVIL ACTION No. 2:05CV959-D**

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**MARTHA SOUTHERLAND AND  
ABS BUSINESS SYSTEMS, INC.\***

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**DEFENDANTS.\***

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**JOINT MOTION FOR EXTENSION OF TIME**

COME NOW the parties and respectfully move this Honorable Court for an extension of time within which to file dispositive motions and to complete discovery.

As grounds therefore, the parties show the following:

1. The deadline to file dispositive motions and for plaintiff to designate experts is November 30, 2006. The deadline to complete discovery is February 9, 2007.
2. Most of the depositions in this case require extensive travel by one or more of the parties. Coordinating counsel's schedules has become increasingly difficult due to scheduling conflicts and the holidays. In addition, unforeseen scheduling conflicts have arisen which have hampered the parties in those efforts.

3. Despite counsel's best efforts to coordinate the depositions, the parties have been unable to complete same. For this reason, counsel are without sufficient information to file dispositive motions at this time.
4. Counsel respectfully request this Court enter an order extending the deadlines to file dispositive motions and designate experts by sixty (60) days and to complete discovery by thirty (30) days. Neither extension will interfere with the current trial date of March 26, 2007.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully move this Honorable Court to enter an Order extending the deadlines to file dispositive motions and designate experts by sixty (60) days and to complete discovery by thirty (30) days.

Respectfully submitted,

s/ Roderick K. Nelson

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